

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA  
V  
FALCON-ZACARIAS, MARTHA  
A 213 547 800

CRIMINAL COMPLAINT  
CASE NUMBER: 1:20-PO 009

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 02/14/2020 in Cameron County, in the SOUTHERN District of TEXAS defendant, an alien did,

knowingly, willfully and in violation of law attempted to gain illegal entry into the United States by willful concealment of a material fact, and in furtherance of such violation presented a United States Passport Card and declared to be a United States citizen,

in violation of Title 8 United States Code, Section(s) 1325 (a) (3).

I further state that I am a (n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant attempted to gain illegal entry into the United States through the Brownsville Matamoros International Bridge in Brownsville, Texas. The defendant presented a United States Passport Card and a United States Birth Certificate from the state of Texas both bearing the name of Lizabeth Lopez-Gamboa and further claimed to be said person to a U.S. Customs and Border Protection Officer. In Customs and Border Protection secondary it was determined that the defendant is not the owner of the documents presented. The defendant was determined to be a citizen and national of Mexico with no legal status to enter and/or be in the United States.

Continued on the attached sheet and made a part hereof: Yes X No

/s/

Jimmy R. Oetjen CBPEO  
Signature of Complainant

Sworn to before me and subscribed in my presence,

February 16, 2020  
Date

at

BROWNSVILLE, TEXAS  
City and State

IGNACIO TORTEYA III, U.S. MAGISTRATE JUDGE  
Name & Title of Judicial Officer

Signature of Judicial Officer